

U.S. Department of Justice

Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 06/30/2021

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

Ruder Finn, Inc.

(b) Registration Number

6840

(c) Primary Business Address

425 East 53rd Street, New York City, NY 10022

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.**3. If the registrant previously filed an Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

## 4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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## (b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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## 5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

Name	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response				

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
Rebecca Baumgaertner	Senior Account Executive	02/12/2021
Rebecca Balough	Junior Editor	04/30/2021
Constantine Frangos	Creative Director	06/16/2021

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Rebecca Baumgaertner	Senior Account Executive	NEOM Company	02/12/2021
Rebecca Balough	Junior Editor	NEOM Company	04/30/2021
Constantine Frangos	Creative Director	NEOM Company	06/16/2021
Rebecca Baumgaertner	Senior Account Executive	Huawei Technologies USA, Inc.	02/12/2021

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

**II - FOREIGN PRINCIPAL**

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant added any new foreign principal(s)<sup>2</sup> during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

NEOM Company

Huawei Technologies USA, Inc.

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup>Yes ☐No ☐N/A ☒Exhibit B<sup>4</sup>Yes ☐No ☐N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☐No ☒

If yes, has the registrant filed an amendment to these exhibits?

Yes ☐No ☐

If no, please file the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
NEOM Company	Design and development of a dedicated website, developed brand strategy, production of videos and developed and implemented social media strategy and policy for NEOM. Monitored social media platforms and assist with social media campaigns related to the promotion of NEOM as a city of the future.
Huawei Technologies USA, Inc.	Strategic counsel, media relations, analyst relations, data insights, content strategy and policy communications.

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

#### 14. (a) RECEIPTS-MONIES

If no, please explain why no monies were received.

\$ 1,201,687.52

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Total

If no, please file the required Exhibit D.

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks" and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Appendix for Response					

\$	153,579.56
Total	

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
01/25/2021	Peyton Francum	Act Blue	Credit Card	\$ 5.00
02/23/2021	Peyton Francum	Act Blue	Credit Card	\$ 5.00
03/23/2021	Peyton Francum	Act Blue	Credit Card	\$ 5.00
04/14/2021	Peyton Francum	Black Lives Matter	Credit Card	\$ 25.00
04/23/2021	Peyton Francum	Act Blue	Credit Card	\$ 5.00
05/14/2021	Peyton Francum	Black Lives Matter	Credit Card	\$ 25.00
05/24/2021	Peyton Francum	Act Blue	Credit Card	\$ 5.00
06/23/2021	Peyton Francum	Act Blue	Credit Card	\$ 5.00

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?<sup>12</sup> Yes ☐ No ☒

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- |  |   |   |  |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper               | <input type="checkbox"/> Advertising campaigns  | <input type="checkbox"/> Press releases       | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches                | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams            |
| <input type="checkbox"/> Email                               |   |   |  |
| <input type="checkbox"/> Website URL(s): _____               |   |   |  |
| <input type="checkbox"/> Social media websites URL(s): _____ |   |   |  |
| <input type="checkbox"/> Other (specify) _____               |   |   |  |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Public officials      | <input type="checkbox"/> Newspapers                   | <input type="checkbox"/> Libraries                |
| <input type="checkbox"/> Legislators           | <input type="checkbox"/> Editors                      | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies   | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups       |
| <input type="checkbox"/> Other (specify) _____ |   |   |

20. Indicate the language used in the informational materials:

- ☐ English ☐ Other (specify) \_\_\_\_\_

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

If no, please please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

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**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature <sup>13</sup>
07/30/2021	Ian Glover	/s/Ian Glover
_____	_____	_____
_____	_____	_____
_____	_____	_____

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

<u>7/30/21</u>	<u>IAN GLOVER</u>	<u>Ian Glover</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

## Appendix

### Response to Item 5(b)

**Item 5(b): During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?**

Name	Residence Address	Citizenship	Position	Date Assumed
Rebecca Baumgaertner	12 Goldsmith Drive Holmdel, NJ 07733	UNITED STATES	Senior Account Executive	11/02/2020
Monica Marshall	10306 Strathmore Hall Road, #403 North Bethesda, MD 20852	UNITED STATES	Executive Vice President	01/28/2021
John Nolan	445 West 23rd Street Apt 9F New York, NY 10011	UNITED STATES	Executive Vice President	01/28/2021
Rebecca Balough	298 Leonard St Apt #3, Brooklyn New York, NY 11211	UNITED STATES	Junior Editor	01/28/2021
Nira Nardeo	30 W 18th St Huntington Station, NY 11746	UNITED STATES	Senior Technical Project Manager	01/28/2021
Christopher Matos	4333 Kepler Ave., Bronx New York, NY 10470	UNITED STATES	Video Producer	01/28/2021
Katharine Dilyard	1309 4th St. SW Washington, DC 20024	UNITED STATES	Senior Account Supervisor	01/28/2021
Evan McCaffrey	204 Jackson St. Apt5 Hoboken, NJ 07030	UNITED STATES	Vice President, Director of Video Production	01/28/2021
Tejas Totade	3519 Park Ave Apt 15 Union City, NJ 07087	INDIA	Chief Technology Officer	01/28/2021
Constantine Frangos	7901 4th Ave. Apt B20, Brooklyn New York, NY 11209	UNITED STATES	Creative Director	01/28/2021
Meredith Isola	9602 Wadsworth Drive Bethesda, MD 20817	UNITED STATES	Senior Vice President	01/28/2021
McKenzie Naylor	21 E. 22nd Street, Apartment 8F New York, NY 10010	UNITED STATES	Vice President	01/28/2021
Matthew Clark	3600 Torrey Pines Road Rio Rancho, NM 87124	UNITED STATES	Producer	01/28/2021
Samantha Stout	99 Acorn Lane Southport, CT 06890	UNITED STATES	Senior Vice President	01/28/2021
Brianna Rabe	3001 Warrington Road Shaker Heights, OH 44120	UNITED STATES	Group Vice President	02/02/2021
Sydney Alcaraz	1408 17th Avenue San Francisco, CA 94122	UNITED STATES	Account Executive	02/11/2021
Pamela Pizarro	329 Hudson Ave Hopacong, NJ 07843	UNITED STATES	Creative Director	03/08/2021
Charles Gould	25 Fifth Avenue, Apt. 1C New York, NY 10003	UNITED STATES	Executive Vice President	05/14/2021
Ms. Isabel Manella	418 West Third Street Lexington, KY 40580	UNITED STATES	Executive Trainee at Ruder Finn	06/25/2021
Ryan Mason	70 Erasmus Street Brooklyn, NY 11226	UNITED STATES	Social Media Researcher	02/04/2021
Stella Heekin	5408 Meridian Ave N, Apt 204 Seattle, WA 98103	UNITED STATES	Senior Account Executive	03/29/2021
Hannah Frick	732 Sackett Street, Apt 3 Brooklyn, NY 11217	UNITED STATES	Account Supervisor	01/04/2021
Lexi Foldenauer	1427 NE 61st Ave Portland, OR 97213	UNITED STATES	Assistant Account Executive	05/28/2021
Sarah Stanley	3515 Runnymede Pl NW Washington, DC 20015	UNITED STATES	Vice President	03/15/2021

Name	Residence Address	Citizenship	Position	Date Assumed
Sonali Munjal	70 Autumn Ridge Road Bedminster, NJ 07921	INDIA	Executive Vice President, Application Development	02/23/2021

**Appendix**  
**Response to Item 12-Desc**

NEOM Company: No Political Activity

Huawei Technologies USA, Inc.: Outreach to publications and facilitation of meetings with Huawei executives.

## Appendix

### Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	05/20/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 4 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 4 topics suggested
Huawei Technologies USA, Inc.	05/21/2021	GrrCon	E-MAIL	Outreach for conference speaker submission with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	CRN	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	InformationWeek	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	Tech Republic	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	InfoWorld	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	CyberScoop	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	RCR Wireless	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	06/03/2021	RCR Wireless	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	Information Age	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/03/2021	Information Age	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/08/2021	Security Magazine	E-MAIL	Outreach for virtual townhall event with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	06/09/2021	Help Net Security	E-MAIL	Outreach for byline interest with Huawei executive - 1 topic suggested
Huawei Technologies USA, Inc.	01/15/2021	CNET	ZOOM	Facilitated Meeting with Huawei USA & Canadian Executives
Huawei Technologies USA, Inc.	02/04/2021	Lawfare/Cybersecurity Podcast	E-MAIL	Outreach for a podcast interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	02/08/2021	CNBC	E-MAIL	Outreach for an editorial board meeting with Huawei executives - 3 topics suggested
Huawei Technologies USA, Inc.	02/09/2021	Lawfare	E-MAIL	Outreach for a podcast interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	02/16/2021	Security Magazine	E-MAIL	Outreach for a byline from Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	03/03/2021	Ars Technica	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/03/2021	CSO	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/03/2021	Dark Reading/Information Week	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	03/03/2021	GCN	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/03/2021	SC Magazine	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/03/2021	Security Magazine	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/03/2021	Security Week	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/03/2021	ThreatPost	E-MAIL	Outreach for background meeting with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/04/2021	CNBC	ZOOM	Facilitated off the record meeting with Huawei and CNBC executives
Huawei Technologies USA, Inc.	03/05/2021	MSNBC	E-MAIL	Outreach for broadcast interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/05/2021	NBC	E-MAIL	Outreach for broadcast interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/10/2021	Bloomberg	E-MAIL	Outreach for podcast interview with Huawei Canada executive - 1 topic suggested
Huawei Technologies USA, Inc.	03/10/2021	Bloomberg	E-MAIL	Outreach for podcast interview with Huawei USA & Canadian executives - 3 topics suggested
Huawei Technologies USA, Inc.	03/10/2021	MSNBC	E-MAIL	Outreach for background meeting or broadcast interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	Bloomberg	E-MAIL	Outreach for podcast interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	Bloomberg	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	03/16/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	Bloomberg	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	The Information	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	ABC	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	ABC	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	ABC	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/16/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/17/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 3 topics suggested
Huawei Technologies USA, Inc.	03/18/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 5 topics suggested
Huawei Technologies USA, Inc.	03/18/2021	Bloomberg	E-MAIL	Outreach for interview with Huawei USA executive - 5 topics suggested

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	03/18/2021	The Information	E-MAIL	Outreach for interview with Huawei USA executive - 5 topics suggested
Huawei Technologies USA, Inc.	03/18/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 5 topics suggested
Huawei Technologies USA, Inc.	03/18/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 5 topics suggested
Huawei Technologies USA, Inc.	03/18/2021	Bloomberg	E-MAIL	Outreach for interview with Huawei USA executive - 5 topics suggested
Huawei Technologies USA, Inc.	04/14/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	ABC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	04/14/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	MSNBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	NPR	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	NPR	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	NPR	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	PBS	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	PBS	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	PBS	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	04/14/2021	CleanTechnica	Signal	Outreach for trending automotive topics and market insights
Huawei Technologies USA, Inc.	05/06/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 4 topics suggested
Huawei Technologies USA, Inc.	05/13/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 1 topic suggested
Huawei Technologies USA, Inc.	05/20/2021	NBC	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	ABC	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	05/20/2021	CNN	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested
Huawei Technologies USA, Inc.	05/20/2021	CBS	E-MAIL	Outreach for interview with Huawei USA executive - 2 topics suggested

## Appendix

### Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
NEOM Company	04/14/2021	NEOM Company	Invoice for professional services	\$59,850.00	
NEOM Company	03/18/2021	NEOM Company	Invoice for professional services	\$162,999.20	
NEOM Company	02/23/2021	NEOM Company	Invoice for professional services	\$37,459.50	
NEOM Company	02/19/2021	NEOM Company	Invoice for professional services	\$55,000.00	
NEOM Company	05/27/2021	NEOM Company	Invoice for professional services	\$88,100.00	
NEOM Company	-----	-----	-----	----->	\$403,408.70
Huawei Technologies USA, Inc.	03/02/2021	Huawei Technologies USA, Inc.	Invoice payment for professional services	\$150,944.56	
Huawei Technologies USA, Inc.	03/09/2021	Huawei Technologies USA, Inc.	Invoice payment for professional services	\$129,220.29	
Huawei Technologies USA, Inc.	04/12/2021	Huawei Technologies USA, Inc.	Invoice payment for professional services	\$142,804.08	
Huawei Technologies USA, Inc.	05/03/2021	Huawei Technologies USA, Inc.	Invoice payment for professional services	\$127,308.43	
Huawei Technologies USA, Inc.	06/10/2021	Huawei Technologies USA, Inc.	Invoice payment for professional services	\$129,010.68	
Huawei Technologies USA, Inc.	02/04/2021	Huawei Technologies USA, Inc.	Invoice payment for professional services	\$118,990.77	
Huawei Technologies USA, Inc.	-----	-----	-----	----->	\$798,278.81

## Appendix

### Response to Item 15(a)-Detail

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
NEOM Company	02/18/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 427.00	
NEOM Company	03/17/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 427.00	
NEOM Company	04/15/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 427.00	
NEOM Company	03/04/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 2,002.00	
NEOM Company	03/04/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 1,614.00	
NEOM Company	04/21/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 2,272.00	
NEOM Company	01/22/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$10,000.00	
NEOM Company	01/13/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 8,050.00	
NEOM Company	05/06/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 2,000.00	
NEOM Company	03/11/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 450.00	
NEOM Company	03/11/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 600.00	
NEOM Company	03/11/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 600.00	
NEOM Company	01/21/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 550.00	
NEOM Company	02/04/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 6,120.00	

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
NEOM Company	01/21/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$26,000.00	
NEOM Company	01/21/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$12,133.33	
NEOM Company	03/04/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$26,000.00	
NEOM Company	04/01/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$26,000.00	
NEOM Company	06/04/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$26,000.00	
NEOM Company	01/27/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 1,500.00	
NEOM Company	02/15/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 150.00	
NEOM Company	02/15/2021	NEOM Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 159.00	
NEOM Company	-----	-----	-----	----->	\$153,481.33
Huawei Technologies USA, Inc.	06/15/2021	Lyft taxi	Taxi to and from meeting	\$ 98.23	
Huawei Technologies USA, Inc.	-----	-----	-----	----->	\$ 98.23